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*Via electronic delivery*

November 29, 2007

Department of the Treasury  
Office of Critical Infrastructure Protection and Compliance Policy  
Room 1327, Main Treasury Building  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

Attention: Treas-DO and Docket Number Treas-DO-2007-0015

*And*

Ms. Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, N.W.  
Washington, DC 20551

Attention: Docket Number R-1298

**Re: Notice of Joint Proposed Rulemaking - Prohibition on Funding of Unlawful Internet Gambling**

Ladies and Gentlemen:

Thank you for providing us with this opportunity to comment on the proposed joint rule to implement the Unlawful Internet Gambling Enforcement Act. Because it is not possible to identify an Internet gambling wire, ACH or check transaction in and of itself, our comment addresses the proposed list of unlawful Internet gambling businesses, potentially the most difficult feature of the proposal.

We believe that a list of such businesses should be developed and maintained by the U.S. Government and made available to financial institutions. Financial institutions should participate in the identification process by reporting suspected unlawful Internet gambling businesses to the U.S. Government through Suspicious Activity Reports (SARs). A financial institution would then block a business transaction involving a listed unlawful Internet gambling business, similar to the process currently used for OFAC.

We believe a professionally trained official of an agency of the U.S. Government would be better able than an employee of a financial institution to determine if a business conducting a gambling-related function is an unlawful Internet gambling business. The accuracy of data developed through a federal investigation with federal investigatory powers would surpass any information developed by a bank employee. Placing the burden of identifying unlawful Internet gambling businesses on the employees of every financial institution in the country would not be effective and would place yet another significant financial burden and liability on this country's financial institutions. Having a financial institution employee providing information to a government official through the existing SAR reporting system appears to be the best, most efficient and cost-effective option.

Thank you for this opportunity to express our thoughts on this important issue. If you want to discuss our comment further, please contact us.

Very truly yours,

Ron Guss  
Vice President  
Compliance Officer  
Legal/Compliance Department

John Dobra  
Director of the  
Financial Intelligence Unit